## SEP 2 2 2000

**CERTIFIED MAIL** 

RETURN RECEIPT REQUESTED

Article Number: P 165 406 549

Mr. Myrl R. Wear Manager Environmental Affairs **AK Steel Corporation** 7000 Winner Road Kansas City, Missouri 64125

Dear Mr. Wear:

RE:

Interim Measures, SWMUs 17 and 33

AK Steel Corporation, Kansas City, Missouri

EPA ID# MOD 007118029

The RCRA Facility Investigation (RFI), dated September 14, 1999, for Armco, Kansas City Facility, documents the release of contamination into the soil and groundwater at Solid Waste Management Units (SWMUs) 17 (Wire Mill Rinsewater Neutralization Tank) and 33 (Nail Mill Degreasing Area). By this correspondence the U.S. Environmental Protection Agency (EPA) is notifying AK Steel of the need for interim measures to monitor the groundwater contamination at SWMUs 17 and 33 in accordance with Section XXXII, D. of Part II of the Permit, which states:

"If, during the course of any activity initiated under this Permit, the Director determines that a release or potential release of hazardous waste including hazardous constituents from a SWMU has occurred, the Director may require additional interim measures. Such interim measures shall be necessary to prevent a threat to human health or the environment and/or to slow or stop the further spread of contamination until corrective action measures can be implemented."

AK Steel must begin quarterly groundwater monitoring at SWMUs 17 and 33 in December 2000. The following is a list of wells that, at a minimum, AK Steel is to sample during each monitoring event:

Shallow Wells	Deep Wells
33MW10S	33MW10D
33MW11S	33MW11D
33MW4S	33MW4
33MW13S	33MW13D
33MW2S	33MW3
33MW2	33MW6D
33MW7S	33MW7D

ARTD/RCAP:JERJOHNSON:LH:X7658:9-11-00:Rev. 9-18-00:AK Steel:IMS17 & 33

**RCAP** 

**JOHNSON** 

**RCAP** LOWE **RCAP** 

**ARTD** 

**SPRATLIN** 

RCRA RECORDS CENTER

Groundwater samples are to be analyzed, at a minimum, for the following compounds:

1,1,1-Trichloroethane Toluene 1,1,2-Trichloroethane trans-1,2-Dichloroethene 1,1-Dichloroethane Trichloroethene 1,1-Dichloroethene Vinyl Chloride 1,2-Dichloroethane Carbon Tetrachloride Benzene Choroethane Chloroform Chlorobenzene Chloromethane 1,1,2,2-Tetrachloroethane cis-1,2-Dichloroethene Ethyl Benzene Methylene Chloride Total Xylenes

Tetrachloroethene

Quarterly groundwater sampling shall take place on or near the 15<sup>th</sup> day of December, March, June, and September. Results from each sampling event as well as tables that depict all prior monitoring results shall be documented in a quarterly groundwater monitoring report. In addition, AK Steel shall summerize trends in the monitoring data and assess any plume movement. If the plume migrates beyond perimeter wells, AK Steel may be required to install and monitor additional wells. Copies of the report shall be submitted to the EPA and the Missouri Department of Natural Resources (MDNR) in accordance with Section XVI. of Part II of the Permit. The report shall be submitted to EPA and MDNR for review only, within 60 days following each sampling event.

Prior to initiating the groundwater monitoring, AK Steel shall revise the existing Quality Assurance Project Plan (QAPP) for the facility or develop a new QAPP to account for the quarterly groundwater monitoring. The existing QAPP or new QAPP shall be revised or developed in accordance with EPA QA/G-5: Guidance on Quality Assurance Project Plans (EPA/600/R-98/018), dated February 1998 and EPA QA/R-5: EPA Requirements for Quality Assurance Project Plans (External Review Draft Final), dated October 1998. The revised or new QAPP shall be submitted to EPA for review and approval within 60 days of receiving this letter.

Please contact Jeremy Johnson, of my staff, at (913) 551-7510, if you have any questions about this letter. Thank you for your cooperation in this matter.

Sincerely,

William A. Spratlin Director Air, RCRA, and Toxics Division

Richard Nussbaum, MDNR

cc:



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101
SEP 2 2 2000

**CERTIFIED MAIL** 

RETURN RECEIPT REQUESTED

Article Number: P 165 406 549

Mr. Myrl R. Wear Manager Environmental Affairs AK Steel Corporation 7000 Winner Road Kansas City, Missouri 64125

Dear Mr. Wear:

RE:

Interim Measures, SWMUs 17 and 33

AK Steel Corporation, Kansas City, Missouri

EPA ID# MOD 007118029

The RCRA Facility Investigation (RFI), dated September 14, 1999, for Armco, Kansas City Facility, documents the release of contamination into the soil and groundwater at Solid Waste Management Units (SWMUs) 17 (Wire Mill Rinsewater Neutralization Tank) and 33 (Nail Mill Degreasing Area). By this correspondence the U.S. Environmental Protection Agency (EPA) is notifying AK Steel of the need for interim measures to monitor the groundwater contamination at SWMUs 17 and 33 in accordance with Section XXXII. D. of Part II of the Permit, which states:

"If, during the course of any activity initiated under this Permit, the Director determines that a release or potential release of hazardous waste including hazardous constituents from a SWMU has occurred, the Director may require additional interim measures. Such interim measures shall be necessary to prevent a threat to human health or the environment and/or to slow or stop the further spread of contamination until corrective action measures can be implemented."

AK Steel must begin quarterly groundwater monitoring at SWMUs 17 and 33 in December 2000. The following is a list of wells that, at a minimum, AK Steel is to sample during each monitoring event:

Shallow Wells	Deep Wells
33MW10S	33MW10D
33MW11S	33MW11D
33MW4S	33MW4
33MW13S	33MW13D
33MW2S	33MW3
33MW2	33MW6D
33MW7S	33MW7D



Groundwater samples are to be analyzed, at a minimum, for the following compounds:

1,1,1-Trichloroethane	Toluene
1,1,2-Trichloroethane	trans-1,2-Dichloroethene
1,1-Dichloroethane	Trichloroethene
1,1-Dichloroethene	Vinyl Chloride
1,2-Dichloroethane	Carbon Tetrachloride
Benzene	Choroethane
Chloroform	Chlorobenzene
Chloromethane	1,1,2,2-Tetrachloroethane
cis-1,2-Dichloroethene	Ethyl Benzene
Methylene Chloride	Total Xylenes

Quarterly groundwater sampling shall take place on or near the 15<sup>th</sup> day of December, March, June, and September. Results from each sampling event as well as tables that depict all prior monitoring results shall be documented in a quarterly groundwater monitoring report. In addition, AK Steel shall summerize trends in the monitoring data and assess any plume movement. If the plume migrates beyond perimeter wells, AK Steel may be required to install and monitor additional wells. Copies of the report shall be submitted to the EPA and the Missouri Department of Natural Resources (MDNR) in accordance with Section XVI. of Part II of the Permit. The report shall be submitted to EPA and MDNR for review only, within 60 days following each sampling event.

Prior to initiating the groundwater monitoring, AK Steel shall revise the existing Quality Assurance Project Plan (QAPP) for the facility or develop a new QAPP to account for the quarterly groundwater monitoring. The existing QAPP or new QAPP shall be revised or developed in accordance with EPA QA/G-5: Guidance on Quality Assurance Project Plans (EPA/600/R-98/018), dated February 1998 and EPA QA/R-5: EPA Requirements for Quality Assurance Project Plans (External Review Draft Final), dated October 1998. The revised or new QAPP shall be submitted to EPA for review and approval within 60 days of receiving this letter.

Please contact Jeremy Johnson, of my staff, at (913) 551-7510, if you have any questions about this letter. Thank you for your cooperation in this matter.

Sincerely,

William A. Spratlin

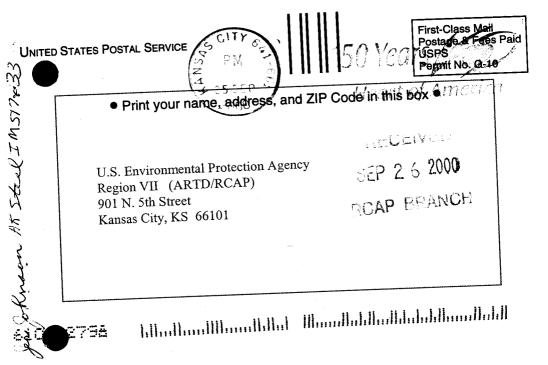
Director

Air, RCRA, and Toxics Division

Richard Nussbaum, MDNR

cc:

Tetrachloroethene



## 165 406 549

## Postal Service

Receipt for Certified Mall	
No Insurance Coverage Provided.  Do not use for International Mail (See reverse)	
Do not use for international many	
Mr. Myrl R. Wear	
Street & Number Manager Environmental Affair	2
Post Office, State, & ZIP Code AK Steel Corporation	
Portion Winner Road	
ckansas City, MO 64125	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered  Return Receipt Showing to Whom, Date, & Addressee's Address  TOTAL Postage & Fees  Postmark or Date	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees \$	
Postmark or Date	
<u> </u>	
SG.	
<u>0</u>	1